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12 Attorneys for Defendants
13 **SAMSUNG ELECTRONICS CO., LTD.**
14 **SAMSUNG ELECTRONICS AMERICA, INC.**

15 **IN THE UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 IN RE: CATHODE RAY TUBE (CRT)
19 ANTITRUST LITIGATION

20 Case No. 3:07-cv-05944 SC

21 MDL No. 1917

22 This Document Relates To:
23 ALL DIRECT ACTION COMPLAINTS

24 **DECLARATION OF IAN SIMMONS IN
25 SUPPORT OF DEFENDANTS' JOINT
26 MOTION TO DISMISS AND FOR
27 JUDGMENT ON THE PLEADINGS AS
28 TO CERTAIN DIRECT ACTION
PLAINTIFFS' CLAIMS**

29 Date: NOVEMBER 30, 2012, 10:00 A.M.
30 (TENTATIVE)
31 Place: JAMS Resolution Center
32 Special Master: Hon. Charles A. Legge
33 (Ret.)

1 I, Ian Simmons, declare as follows:

2 1. I am an attorney with O'Melveny & Myers LLP, attorneys for Samsung
3 Electronics Co., Ltd., and Samsung Electronics America, Inc. in this action. I am a member of
4 the bar of the District of Columbia and am admitted to practice before this Court *pro hac vice*. I
5 make this Declaration in support of Defendants' Joint Motion to Dismiss and for Judgment on the
6 Pleadings as to Certain Direct Action Plaintiffs' Claims. If called as a witness, I could, and
7 would, testify to the matters set forth in this declaration of my own personal knowledge.

8 2. Attached hereto as **Exhibit 1** is a true and accurate copy of a letter to Eva W. Cole
9 and Molly M. Donovan from Philip J. Iovieno, dated July 17, 2012.

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11 Dated: August 17, 2012
12 Washington, D.C.
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/s/ Ian Simmons

Ian Simmons